

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MICHELLE CHRISTIAN,

Plaintiff,

v.

OMNIS GLOBAL TECHNOLOGIES, LLC;
OMNIS BUILDING TECHNOLOGIES, LLC;
OBT BLUEFIELD, LLC; OMNIS FUEL
TECHNOLOGIES LLC D/B/A OMNIGEN;
OMNIS SUBLIMATION RECOVERY
TECHNOLOGIES, LLC; AND SIMON
HODSON,

Defendants.

Civil Action No. 2:24-cv-01319

**CERTIFICATION OF HALEY R. NORWILLO IN SUPPORT OF DEFENDANTS’
MOTION TO COMPEL DISCOVERY**

I, Haley R. Norwillo, herby certify pursuant to Local Rule 26.1(f):

1. I am counsel for Defendants in this matter.
2. On July 15, 2025, the Parties held a meet and confer via Zoom to discuss each Party’s alleged discovery deficiencies. During the one-hour long call, the Parties reached resolution on some of the alleged deficiencies and agreed to proceed to motion practice on others.
3. After reasonable effort, the Parties remain unable to resolve the disputes regarding Plaintiff’s refusal to both respond to Interrogatory No. 1 and withdraw her conditional responses.

I hereby certify the foregoing is true and correct.

Dated: August 15, 2025

Respectfully submitted,

/s/ Haley R. Norwillo

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